



WASHINGTON CATTLE FEEDERS ASSOCIATION

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December 5, 2005

Dear Mr. Hancock,

Thank you for your presentation which we attended in Yakima, Wa. on Thursday evening, December 1, 2005. It was an informative meeting and there were lots of good questions and responses to consider.

In response to your request for comments, here are several that we feel need to be addressed:

- S1.A.1- Do we need to define what a "Veal Large CAFO" is? More specifically, we think we need a strict definition as to what "Veal" is.
- S1.A.3- States that discharges may not cause or contribute to a violation of water quality standards. Does this negate the 25 yr/ 24 hr storm event clause?
- S1.B- Process wastewater discharges- Does this give the DOE the free rein to check ground water and the feedlot to be the source of contamination?
- S1.D.1.b- What is the purpose of this? Water lines are all underground.
- S3.D.2- This is unclear because the field areas to apply nutrients are likely to change yearly. Does that mean the Nutrient Management Plan has to be rewritten accordingly?
- S4.- Record keeping, Reporting, and Environmental Monitoring- We don't feel this is clear as to which provisions in this section apply to CAFO's that are applying to land they own or control, and CAFO's that are exporting their nutrients.
- G.4.e- If the government cannot regulate on potential then they should not be able to sample on potential.
- G.9- Does this give us ample protection against an arbitrary requirement being put in place against a feedlot to do groundwater (or other) monitoring without due process?
- G12.D- This seems pretty open-ended.
- G17- Should there be a maximum total penalty? Is this penalty in addition to the Federal penalty? What is the fine or action for a less egregious or willful/wanton violation?

Thank you for considering and responding to our inquiries.

Ed Field, Executive Director, WCFA

